

**FERRARA LAW GROUP, P.C.**  
Ralph P. Ferrara, Esquire (ID #024521985)  
Kevin J. Kotch (ID #050341993)  
50 W. State Street, Suite 1100  
Trenton, New Jersey 08608  
P: (609) 571-3738  
F: (609) 498-7440  
*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

**MARK DANIEL HOSPITALITY  
LLC (d/b/a INC)**

*Plaintiff,*

v.

**AMGUARD INSURANCE  
COMPANY**

*Defendant.*

NO. 3:20-cv-06772-FLW-TJB

**NOTICE OF MOTION**

TO: Susan M. Leming, Esquire  
Brown & Connery, LLP  
360 Haddon Avenue  
P.O. Box 539  
Westmont, New Jersey 08108

Kerri E. Chewing, Esquire  
Archer & Greiner, P.C.  
One Centennial Square  
Haddonfield, New Jersey 08003

*Attorneys for Defendant*

**PLEASE TAKE NOTICE THAT**, Plaintiff Mark Daniel Hospitality LLC (d/b/a INC), by and through its undersigned counsel of record, shall move the United States District Court for the District of New Jersey, before the Honorable

Freda L. Wolfson, U.S.D.J., at the Clarkson S. Fisher Building & U.S. Courthouse, Trenton, New Jersey, on July 20, 2020, for an order remanding this case to New Jersey state court.

**PLEASE TAKE FURTHER NOTICE THAT** Plaintiff shall rely upon its Memorandum of Law and Certification of Ralph P. Ferrara, Esquire and the accompanying exhibits in support of its Motion.

**PLEASE TAKE FURTHER NOTICE THAT** Plaintiff respectfully requests oral argument, should this motion be opposed.

Respectfully submitted,

**FERRARA LAW GROUP, P.C.**

DATE: June 26, 2020

BY: /s/ Ralph P. Ferrara  
RALPH P. FERRARA, ESQUIRE  
Attorney for Plaintiff Mark Daniel  
Hospitality LLC (d/b/a INC)